

To: Beeler, Cindy[Beeler.Cindy@epa.gov]
Cc: O'Connor, Darcy[oconnor.darcy@epa.gov]; Daly, Carl[Daly.Carl@epa.gov]
From: Rothery, Deirdre
Sent: Mon 12/28/2015 8:31:20 PM
Subject: RE: Beeler to Speak with CDPHE Oil & Gas Team 1/4/16

Hi Cindy,

As we chatted about, here are some talking points for the FIP. I am cc'ing Darcy and Carl so they are in the loop and can chime in if they have different thoughts. Let me know if you have any questions or need any additional information. Take care, Dee

- The Uinta Basin in eastern Utah has experienced high winter ozone values that exceed NAAQS (with some winters having ozone values over 100ppb).
- The large majority of VOC emissions in the Basin are from existing oil and gas production.
- If necessary and appropriate, EPA may issue a site specific FIP for tribal lands at risk of becoming nonattainment status, consistent with EPA's Tribal Authority Rule.
- From the proposed national oil and gas rules: "The EPA's plan is to address existing sources, to the extent necessary, in the context of area- or reservation-specific FIPs designed to address areas or reservations with air quality issues (including nonattainment areas), as they arise, that are associated with oil and natural gas activities."
- There is a discrepancy between the control requirements on the U&O Indian Reservation and those required by UDAQ.
- A U&O FIP will ensure that the public within the U&O Indian Reservation receive equivalent air quality protections as the public outside the Reservation by requiring similar VOC control requirements on the Reservation to those required by UDAQ.
- Using existing Tribal Minor source registration data, we anticipate this to affect up to 5,200 existing facilities and reduce VOC emissions by ~42,000 tpy.
- Proposed FIP control requirements would be consistent with NSPS OOOO

and the recommendations included in the draft Control Techniques Guidelines.

- Proposed FIP would only cover existing oil and gas production sources, since new sources will be covered by national oil and gas rules (NSPS OOOO and Tribal NSR FIP).
- EPA would have a public comment period and respond to comments before issuing a final rule.
- The Region would plan to finalize the FIP after the revisions to NSPS OOOO and the Tribal NSR FIP are issued final (late spring 2016).
- Region 8 has conducted stakeholder meetings with industry, environmental groups, counties and federal land managers to solicit input regarding EPA's consideration of a potential U&O FIP.
- UDAQ participated in the stakeholder meetings and supports the idea of U&O FIP as most of the existing oil and gas sources in the Uinta Basin are located on the Reservation.
- At meetings with the Region, the Ute Tribe's Business Committee has been supportive of the idea of the U&O FIP and tribal staff have participated in the stakeholder meetings.

From: Beeler, Cindy

Sent: Tuesday, December 22, 2015 12:45 PM

To: Daly, Carl <Daly.Carl@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>; Farris, Laura <Farris.Laura@epa.gov>; Morales, Monica <Morales.Monica@epa.gov>

Cc: O'Connor, Darcy <oconnor.darcy@epa.gov>; Card, Joan <Card.Joan@epa.gov>

Subject: Beeler to Speak with CDPHE Oil & Gas Team 1/4/16

Mark MacMillan of CDPHE's Air pollution Control Division has asked me to meet with their Oil & Gas Team to discuss informally what EPA and Region 8 are doing in the realm of oil & gas – and Mark later in the conversation asked for “energy-related”. This will take place on Jan. 4, 2016.

Could your folks provide the following information:

1. Dee – What can I say about our Uinta Basin potential rulemaking work?
2. Laura – Do you have some canned talking points on status on Clean Power Plan – tools/training being developed for States, outreach to States, upcoming schedule for submittals/review etc.?
3. Monica – Is there anything we want to (or can) say about CO's ozone SIP? How we have begun conversations, want to be engaged to ensure efficient SIP review and approval, etc?

If there's anything I'm missing that you reckon would be informative and of interest and is not a lot of work to produce, let me know ☺

Thanks!

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